

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST’S MOTION TO SEAL EXHIBITS 1 AND 2 TO THE
PROPOSED SUPPLEMENTAL BRIEF TO HIS MOTION TO COMPEL AND
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO SEAL**

Defendant Richard Mast hereby moves for an order to seal Exhibits 1 and 2 to his proposed supplemental brief to his currently pending motion to compel (Dkt. No. 289 & 291) pursuant to Local Civil Rule 9 and this Court’s Protective Order (ECF No. 26). The documents were provided by Plaintiffs in discovery on October 20, 2023 and are labelled “Confidential.”

In support of this motion to seal, Defendant Richard Mast states as follows: This Court has issued a Protective Order (ECF No. 26) providing that a designation by a party that material is confidential requires all parties to treat that material as confidential until the disclosing party withdraws the designation or the Court orders the document to be considered not confidential. Accordingly, Defendant Mast requests that the Court order the sealing of Exhibits 1 and 2, provided to the Court by email..

A proposed Order is attached as Exhibit A to this Motion.

Dated: October 26, 2023

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.*

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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/David Yerushalmi
David Yerushalmi, Esq.